

JASON M. FRIERSON  
 United States Attorney  
 Nevada Bar No. 7709  
 DANIEL D. HOLLINGSWORTH  
 Assistant United States Attorney  
 Nevada Bar No. 1925  
 501 Las Vegas Boulevard South, Suite 1100  
 Las Vegas, Nevada 89101  
 (702) 388-6336  
 Daniel.Hollingsworth@usdoj.gov  
 Attorneys for the United States

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EVE E. MAZZARELLA, and  
 MELISSA R. BEECROFT,

Defendants.

2:08-CR-064-JCM-EJY

**Government's Unopposed Motion to  
 Extend Time to File its Motions Regarding  
*Honeycutt, Thompson, and the Eighth  
 Amendment as Applied to the Defendants  
 or to Settle under ECF No. 691  
 (Eleventh Request)***

This Motion to Extend Time is the eleventh request. LR IA 6-1.

The United States of America respectfully moves this Court for an Order extending the time for the government to file its Motions Regarding *Honeycutt, Thompson, Prasad*, and the Eighth Amendment as Applied to the Defendants or to Settle under ECF No. 691.<sup>1</sup> The reason is the parties are engaged in negotiations to resolve the forfeiture matters and they agreed to the extension. The current deadline is February 3, 2023. The government requests an extension until August 3, 2023.

The forensic review of the records is completed. Calculations for each defendant's liability are ongoing. The parties continue to negotiate the settlement of their respective forfeiture amounts. Beecroft has agreed to a dollar amount and is in process of negotiating

<sup>1</sup> *Honeycutt v. United States*, 581 U.S. 443 (2017); *United States v. Thompson*, 990 F.3d 680 (9th Cir. 2021); and *United States v. Prasad*, 18 F.4th 313 (9th Cir. 2021).

1 the stipulation. Mazzarella's attorney has provided her position as to the money judgment  
2 amount.

3 On January 23, 2023, Angela Dows, counsel for Melissa R. Beecroft, agreed to this  
4 extension. On January 23, 2023, John D. Kirby, counsel for Eve E. Mazzarella, agreed to  
5 this extension.

6 Because of the foregoing reasons, the government requests the extension of time until  
7 August 3, 2023, for the defendants and the government to settle, and if settlements do not  
8 occur, to place the required documents on a computer program as evidence, to file motions,  
9 responses, replies, and to have a forfeiture hearing.

10 This Motion is not submitted solely for the purpose of delay or for any other  
11 improper purpose.

12 This Court should grant an extension of time to, and including, August 3, 2023.

13 DATED: January 25, 2023.

14 JASON M. FRIERSON  
15 United States Attorney

16 /s/ Daniel D. Hollingsworth  
17 DANIEL D. HOLLINGSWORTH  
18 Assistant United States Attorney

19  
20 IT IS SO ORDERED:

21 James C. Mahan  
22 JAMES C. MAHAN  
23 UNITED STATES DISTRICT COURT JUDGE

24 DATED: January 30, 2023  
25  
26  
27  
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**CERTIFICATE OF SERVICE**

A copy of the foregoing was served upon counsel of record via Electronic Filing on  
January 25, 2023, and by

First Class Mail:

John D. Kirby  
Counsel for Eve Mazzearella  
401 West A Street, Suite 1150  
San Diego, CA 92101

/s/ Heidi L. Skillin  
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HEIDI L. SKILLIN  
FSA Contractor Paralegal